

Lady Benjamin Cannon, A.S.C.E.
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Defendant
LADY BENJAMIN CANNON, A.S.C.E.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANDREW G. WATTERS,

Plaintiff,

vs.

LADY BENJAMIN CANNON, A.S.C.E.
(Erroneously and deliberately sued in an
attempt to sexually harass me as “BEN
CANNON”[SIC]) and DOES 1 through 50,
Defendants.

Case No: 21-cv-02398-SK

Related Case pending joinder: 22-cv-02476-
AGT

Related Case Removed from State Case No:
CGC-20-586215

**DECLARATION OF LADY BENJAMIN
CANNON, A.S.C.E. IN OPPOSITION TO
MOTION TO SERVE VIA
“PUBLICATION AND MAILING”
MOTION TO STRIKE OR IN THE
ALTERNATIVE DEMMUR AND IN THE
ALTERNATIVE MOTION TO DISMISS
REQUEST FOR PERMANENT
RESTRAINING ORDER
REQUEST TO DECLARE PLAINTIFF A
VEXTATIOUS LITIGANT
REQUESTS FOR JUDICIAL NOTICE**

I, LADY BENJAMIN CANNON, A.S.C.E. declare and state:

1. I am the defendant in this action. I make this declaration in opposition to WATTERS motion to allow service by “publication & mail”, I am over the age of eighteen years. I have personal

knowledge of all facts stated in this declaration and could and would competently testify to them in court at any trial and/or hearing.

2. In 1992 at the age of 12 years old I founded a dialup ISP that grew into the world's only global encrypted fiber optic telephone company serving 190 countries on 6 continents¹.
3. In 2014 I co-founded² and served as CTO of an NYSE public company; NYSE:RMO³ with "a vision to create an electrified world where all have access to clean energy"⁴.
4. I hold and have held for nearly 2 decades, three professional licenses from the state of California, including the licenses required for constructing a Nuclear Power Plant or Underground Power Transmission Lines. I hold Classifications "B", "C-20" and "A". My license number is #884900⁵ (retired).
5. I cannot access PACER. See **Exhibit "A" PACER error - requires security token to access case information.**
6. PACER has sent me a token, however the mailbox it has been sent to has been seized by none other than the defendant in this action, Andrew Watters.
7. Andrew Watters and my landlord Charles Jadallah, by Watters own admission, collaborated and "high-fived"⁶ each other, while illegally locking me out of my mailbox at my home.
 - a. Mr. Watters filmed himself doing this and posted the video to the internet at:
<https://www.andrewwatters.com/hall-of-shame/6x7/>⁷ RJN
 - b. and on YouTube at:

¹ <https://www.issuewire.com/6x7-networks-and-ntt-communications-to-link-networks-in-global-ip-deal-1646312626403329> RJN

² <https://www.issuewire.com/6x7-networks-founder-takes-ev-battery-romeo-systems-public-through-a-133-billion-spac-deal-1684387461596006> RJN

³ <https://www.reuters.com/article/us-romeo-systems-m-a-rmg-acquisition/ev-battery-maker-romeo-systems-to-go-public-through-a-1-33-billion-spac-deal-idUSKBN26Q1PM> RJN & <https://www.issuewire.com/6x7-networks-founder-takes-ev-battery-romeo-systems-public-through-a-133-billion-spac-deal-1684387461596006> RJN

⁴ https://www.romeopower.com/about/our_story

⁵ <https://www.cslb.ca.gov/onlineservices/checklicenseII/LicenseDetail.aspx?LicNum=884900>

⁶ In Mr. Watters' own words.

⁷ We have already substantially answered this complaint in the related state court action that is currently subject to a joinder action, however, it needs to be repeated, that this website is produced by an admitted criminal and bipolar former attorney of mine, in an attempt to extort me for money. The allegations are false and defamatory and sanctiaon-able, and I condemn them in the strongest terms possible.

<https://youtube.com/shorts/PZx1OBW5gZs?feature=share> RJN

c. and also at:

d. <https://youtube.com/shorts/uWhMxnj97bI?feature=share> RJN

8. I am not evading service in this or any matters, however I am presently indigent due in large part to felonious criminal conduct by Mr. Watters, who has contacted all of my customers and told them I am a fake woman with a fake telecom company (see **Exhibit “A.1” email from Andrew Watters to Datacenters.com directing them to discontinue business**).

9. Mr. Watters continues to collaborate with my landlord to steal mail out of my mailbox at 5030 3rd st⁸. I believe this was done to intentionally deprive me of notice of various trial dates, and indeed to impede my access to the court at all. I have reported him to the Postmaster General for mail theft in complaint number: 37553058 (see **Exhibit “A.2” – Federal Criminal Complaint**)

RJN

10. It has been successful, I have no idea when hearings, trials, other matters etc. have been set or will be held in this or other matters.

11. **I found out about this latest motion of Mr. Watters only by chance, in that I logged in to PACER on a government-owned pre-authorized terminal made available in the Clerk’s office while I was physically at the District Court at 450 Golden Gate, FL16 this very morning filing documents in another case.**

12. In-fact, I have not read the motion, I only had time to view the title of the documents in the case, and file my opposition only upon that basis.

13. In this case, though it is difficult to decipher the complaint which should be dismissed for failure to state a claim.

14. To the extent possible, I would like the court to consider this a motion to dismiss the complaint(s) (both the action(s) pending joinder from state court and the original EDJX federal action) with prejudice for amongst others as the court sees fit upon its own motion, which it should exercise for:

⁸ See videos and “high-five” admissions in <https://www.andrewwatters.com/hall-of-shame/6x7/#eviction>

- a. Any and all of the merits of the fine “ORDER FOR REASSIGNMENT AND REPORT AND RECOMMENDATION TO DENY MOTION FOR DEFAULT JUDGMENT” prepared in this case by Hon. Sallie Kim dated September 20, 2021⁹.
- b. Mail Theft is a Federal Felony, 18 U.S. Code § 1708 provides in pertinent part:
- i. Whoever steals, takes, or abstracts, or by fraud or deception obtains, or attempts so to obtain, from or out of any mail, post office, or station thereof, letter box, mail receptacle, or any mail route or other authorized depository for mail matter, or from a letter or mail carrier, any letter, postal card, package, bag, or mail, or abstracts or removes from any such letter, package, bag, or mail, any article or thing contained therein, or secretes, embezzles, or destroys any such letter, postal card, package, bag, or mail, or any article or thing contained therein; or
 - ii. Whoever steals, takes, or abstracts, or by fraud or deception obtains any letter, postal card, package, bag, or mail, or any article or thing contained therein which has been left for collection upon or adjacent to a collection box or other authorized depository of mail matter; or
 - iii. Whoever buys, receives, or conceals, or unlawfully has in his possession, any letter, postal card, package, bag, or mail, or any article or thing contained therein, which has been so stolen, taken, embezzled, or abstracted, as herein described, knowing the same to have been stolen, taken, embezzled, or abstracted—
 - iv. Shall be fined under this title or imprisoned not more than five years, or both.
 - v. (June 25, 1948, ch. 645, 62 Stat. 779; May 24, 1949, ch. 139, § 39, 63 Stat. 95; July 1, 1952, ch. 535, 66 Stat. 314; Pub. L. 103–322, title XXXIII, § 330016(1)(I), Sept. 13, 1994, 108 Stat. 2147.)

c. The Crime Victims Rights Act¹⁰ provides in pertinent part:

(a) RIGHTS OF CRIME VICTIMS.--A crime victim has the following rights:

⁹ Docket, Document 24. RJN.

¹⁰ 18 U.S.C. § 3771

(1) *The right to be reasonably protected from the accused.*

(2) *The right to reasonable, accurate, and timely notice¹¹ of any public court proceeding, or any parole proceeding, involving the crime or of any release or escape of the accused.*

(3) *The right not to be excluded from any such public court proceeding, unless the court, after receiving clear and convincing evidence, determines that testimony by the victim would be materially altered if the victim heard other testimony at that proceeding.*

- d. The multiple false and defamatory accusations on Mr. Waters website as delineated above.
- e. The sexually perverse and false e-mails about my genitals to my current counsel in unrelated matters.
- f. The admitted accessory to PC460 (First degree Felony burglary of an occupied dwelling – a strike felony) conduct by Mr. Watters as delineated on said above websites and many of my declarations – insofar as Mr. Watters admitted to participating in an armed home invasion robbery of my home and startup, after my landlord lost an eviction case against me.
- g. Mr. Watters has admitted to using my confidential customer list, which he had as he was my general counsel for 15 days or so, in order to call all of my customers, tell them I am a fake woman running a fake telecom company (despite in many cases, such as both of these actions, actually having connected telecommunications services to these companies

¹¹ emphasis added

that were in-fact in production and passing packets successfully – as Mr. Waters even admits and we will later provide pictures of.)

- h. Mr. Watters has accused me elsewhere of defrauding the government by registering my company as a woman owned small business – on the basis that I am a “fake woman”.
- i. Mr. Watters is displaying conduct indicative of a Bipolar manic episode triggered by his mixing alcohol¹² and anti-psychotic medications against label instructions¹³ and should not be practicing law. It is an undisputed material fact that Mr. Watters has been diagnosed with Bipolar Disorder by a Doctor.
- j. Mr. Watters has admitted to committing a crime, which resulted in his failure of an FBI criminal background check.
- k. Mr. Watters only case law was created when he was sanctioned for violating the Rules of Professional Conduct repeatedly and for other heinous acts that the Court can read for itself in the published decision¹⁴. The court found the conduct so reprehensible it awarded the victim of Mr. Watters over \$400,000.00 in sanctions¹⁵.
- l. Mr. Watters seems to have taken the theory that I started a fake telecom company in order to defraud him, and that in order to do that, I had to start a real telecom company

¹² “But don't change your two-beer lunch because you are afraid of a client seeing you drink.” <https://hyper.law/guide/hot-topics/health-concerns/>

¹³ Mr. Watters has admitted to me and to other members of my staff including my Chief Business Officer Kar Dhillon that he 1. suffers from Bipolar disorder and other mental health disorders including the “dark triad” personality types, 2. that he drinks daily and heavily to self-medicate for these disorders, and 3. That he has been formerly diagnosed with Bipolar Disorder Type-2 by a licensed Psychiatrist who has observed him over the course of 4 or more days and administered many standardized tests and 4. That he takes prescription medications for these disorders that specifically direct him not to mix them with alcohol. While diagnoses with a mental disorder, in of itself, is not grounds for revocation of a license to practice law, Mr. Watters other conduct insofar as his counter-label and out of control substance abuse, abuse to others as detailed on his own website at andrewwatters.com, his ownership of semi-automatic firearms, his video on youtube about the depressed alcoholic suicidal lawyer with a semi-automatic firearm at <https://www.imdb.com/title/tt11361996/> RJN (see the video itself at: <https://www.youtube.com/watch?v=KBJO5JMukHM>) RJN which he claim earned him “\$1,500” at “the box office” on his own self-created IMDB page, the conduct that the Appellate Division has sanctioned, and the behavior the FBI has sanctioned, as well as his horrifying and sexual-based abuse towards me, are all deeply troubling in context and totality, which are in-fact the grounds for revoking a license to practice law.

¹⁴ <https://caselaw.findlaw.com/ca-court-of-appeal/1566241.html>

¹⁵ “The Adversarial Tone Continued On Appeal” “Accordingly, Jill was ordered to pay \$100,000 in sanctions plus \$304,387 in attorney fees to Ken. Unfortunately for her, Wife's attorneys' strategies on appeal remained obdurate. By this point Andrew Watters had gone “walkabout” and left the firm (following the trial court decision) - <https://www.thurmanarnold.com/family-law-blog/2011/may/marriage-of-davenport-trial-court-sanctions-wife/> RJN

that provided him “adequate service” by his own admission on his website and blog-
posts-turned-complaints. This is in his own words in his own complaints.

15. The court could dispose of this entire action with prejudice upon its own motion, and it should.

16. The court could find that the former attorney of mine Andrew Watters is violating clearly
established rules of professional conduct insofar as he is seeking to release attorney/client
information into the public domain.

17. The court could find that the action accusing me of being a fake woman running a fake telecom
company is obviously transphobic on its face and should be dismissed as quickly as a lawsuit
against a person for being of a certain race should be dismissed with extreme prejudice. The
court could find that all of this violates the Unruh Civil Rights act and award me sanctions
accordingly.

18. Mr. Watters did send the attached e-mail **Exhibit “B” – email calling me a derogatory slur
 (“transvestite” and sexually harassing me re my genitals – also enticing my lawyers in
 another matter to quit)** to most of my lawyers, trying to convince them to withdrawal as
counsel. In this e-mail attached as Exhibit “B”, Mr. waters uses a derogatory term
“transsexual¹⁶” which I object to, and which is meant to degrade and insult transgender women
to describe me, and shockingly and invasively and incorrectly describes both my genitals and my
medical plans. Use of derogatory slurs is prima facie evidence of discrimination¹⁷. The sexual
harassment is another matter.

19. This should be treated please as a motion to dismiss and/or strike any and all of Mr. Watters
complaints against me, and I would like the court to consider weather he is a Vexatious litigant
and should be barred from filing further similar actions against me in the state or district courts.

20. I enclose my 4 certificates as a Lady of Glencoe and Lady of Lochaber as **Exhibit “C” Royal
Certificates.** RJN

¹⁶ <https://www.equalityhumanrights.com/en/advice-and-guidance/gender-reassignment-discrimination> RJN

¹⁷ Armando Rios, Jr. v. Meda Pharmaceutical, Inc.

https://www.njcourts.gov/attorneys/assets/opinions/supreme/a_23_20.pdf?c=PDD and other authority inc state law.

21. I enclose my certificate from the American Society of Civil Engineers (“ASCE”), as **Exhibit “D” A.S.C.E. Certificate.** RJN

22. I enclose my certificate from the I.E.E.E. Society (Institute for Electronic and Electrical Engineers, or “IEEE”), as **Exhibit “E” I.E.E.E. Certificate.** RJN

23. I enclose a check from a brief engagement as a guest lecturer at Stanford University’s PHD Photovoltaic Research Laboratory. **Exhibit “F” Stanford University Payment to Lady Benjamin.**

24. I enclose a photograph of me inside the (now very radioactive) target chamber at Lawrence Livermore National Laboratory's (LLNL's) National Ignition Facility (NIF¹⁸) from 2009. **Exhibit “G” Lady Benjamin Cannon, A.S.C.E. in target chamber at NIF.** RJN

25. NIF is a quite literal fusion reactor, located at the Lawrence Livermore National Laboratory in Livermore, California. It houses the largest, most precise, and most energetic laser in the world.

a. It reaches temperatures of more than 100million degrees Celsius, and more than 100 billion times the pressure of earth’s atmosphere¹⁹.

b. This giant \$3.5bn²⁰ facility a 10-story building the size of 3 football fields, can deliver more than 2 million joules of ultraviolet laser energy in billionth-of-a-second pulses onto a target about the size of a pencil eraser.

26. I enclose a photograph of an advertisement for 6x7’s service as **Exhibit “H” SPEEDTEST.** The speed-test in the advertisement is a real test of a real 6x7 customer connection in a real office building, on a real computer, through our real core router infrastructure, through our real Autonomous System, AS15206²¹ formerly owned by PacWest Telecom. This test shows us achieving over 9,300mbit/second. Autonomous system numbers are issued by a delegated authority of the Federal Government²². These things cannot be faked.

¹⁸ <https://www.llnl.gov/news/national-ignition-facility-experiment-puts-researchers-threshold-fusion-ignition> RJN

¹⁹ <https://www.youtube.com/watch?v=KOZIx5JUHbc> RJN

²⁰ <https://lasers.llnl.gov/about/faqs> RJN

²¹ <https://whois.ipip.net/AS15206> RJN

²² <https://www.arin.net/about/corporate/history/> RJN

27. In addition, I enclose a copy of our license from the FCC to operate a telecommunications company as **Exhibit “I” FCC license.** (RJN)

28. Finally, I enclose a photograph of the routers we installed for EDJX²³, which in-fact provided service to them which they bragged about in the media²⁴, service location at 2401 Walsh, Santa Clara, CA²⁵, as **Exhibit “J” Photograph of 6x7 dual redundant core routers in-service and passing packets to EDJX.io, a 6x7 partner. Taken Sept 26, 2021 at 5:54am by 6x7 Global Security, the investigative division within my company that investigates threats to America’s telephone infrastructure.**

29. I would like the court to award me whatever it deems fit in terms of compensation, but please consider this to the extent required a prayer for any and all relief the court sees fit within the law to grant me, including without limitation a dismissal of this complaint with prejudice, and a permanent restraining order enjoining Mr. Watters from further harassment and also directing him and his associates to restore my access to my mailbox(es) and my apartment, as well as declaring Mr. Waters a vexatious litigant²⁶. I will leave any financial matters to your discretion, however Mr. Watters has ruined a company that Steve Russell²⁷ the co-founder of Uber and Ring and presently running the Venture Capital firm Prism Insights Fund²⁸ “ had valued at \$100,000,000 (see **Exhibit “K” Preferred stock Term Sheet pro-forma valuing 6x7 at \$100m** also in addition please see **Exhibit “L” 6x7 Pro Forma Cap Table** also in addition please see **Exhibit “M” email from full time advisor Sean Snyder memorializing terms of the \$100m offer decided with the 3 of us at the Battery SF).**

30. In addition to my mailbox and the tools with which I make a living, Mr. Watters and his associates have also stolen many other things such as my computers upon which I prepare

²³ <https://www.prnewswire.com/news-releases/edjx-and-6x7-networks-partner-to-expand-edjxs-serverless-edge-computing-platform-across-6x7s-global-network-301007336.html> RJN

²⁴ <https://www.edgeir.com/edjx-rolls-out-serverless-edge-computing-platform-across-6x7-networks-infrastructure-20200428> RJN

²⁵ <https://www.6x7networks.com/services> RJN

²⁶ I don’t know what to do here, I could potentially prepare a proposed order if the court is open to the relief and will do so if directed by the court, thank you your honor.

²⁷ <https://www.linkedin.com/in/thesteverussell/> RJN

²⁸ <https://www.crunchbase.com/organization/prism-insights-fund> RJN

documents, my many color laser printers, my food, my bed, my washing machine and my prescription medication (estrogen). I believe there may be an element in this case of violations of Title IV and the Unruh Civil Rights Act. At this time I am indigent and largely unable to access the court in any way. I will attempt to hand file this when I locate a printer, I am going to attempt the public library.

31. Thank you your honor.

SIGNATURE

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on April 22, 2022, at San Francisco, California.

Lady Benjamin Cannon, A.S.C.E.

- LADY BENJAMIN CANNON, A.S.C.E.